

Exhibit 78

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA
2 FOR THE COUNTY OF LOS ANGELES

3 KIRK VON SALZEN and
4 JANET VON SALZEN,
5 Plaintiffs,
6 vs.
7 AMERICAN INTERNATIONAL
8 INDUSTRIES INC. (sued
9 individually and as
successor to PINAUD, INC., ED
10 BARBARA ALICE, INC., ED
PINAUD, INC. d/b/a ED.
PINAUD, and NESTLE-LE MUR
COMPANY); et al.,
11 Defendants.
12
13

Case No. JCCP 4674/
BC680576

14 DEPOSITION OF
15 WILLIAM E. LONGO, PhD

16
17 June 27, 2018
18 11:28 a.m.
19 11555 Medlock Bridge Road, Suite 100
Johns Creek, Georgia
20
21
22 Debra R. Luther, RMR, CRR, CCR-B-881
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25 Mr. Connor Scott (via telephone)

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18	(Original Exhibits 1 through 7 and 9	
19	through 12 have been attached to the original	
20	transcript. Exhibit 8 was not provided to court	
21	reporter at time of production.)	
22		
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1 (Reporter disclosure made pursuant to
 2 Article 10.B. of the Rules and Regulations of
 3 the Board of Court Reporting of the Judicial
 10:46:43 4 Council of Georgia.)
 10:49:21 5 (Defendant's Exhibits 1 and 2 were marked
 11:27:44 6 for identification.)

11:27:45 7 WILLIAM E. LONGO, PhD,
 8 having been first duly sworn, was examined and
 11:27:46 9 testified as follows:

11:27:46 10 EXAMINATION

11:27:46 11 BY MR. NORRIS:

11:27:46 12 Q. Just as a matter of housekeeping, I have
 11:27:57 13 gone ahead and marked as Defendant's Exhibit 1
 11:28:02 14 defendant Johnson & Johnson's notice of taking
 11:28:05 15 deposition of plaintiffs' expert witnesses and
 11:28:08 16 request to produce, and Exhibit 2 is going to be the
 11:28:13 17 letter served by King & Spalding confirming this
 11:28:16 18 date, time, and location, just for housekeeping.

11:28:18 19 I'm also going to mark as Defendant's
 11:28:21 20 Exhibit 3 a set of what appear to be typewritten
 11:28:26 21 notes prepared by Dr. Longo.

11:28:28 22 (Defendant's Exhibit 3 was marked for
 11:28:30 23 identification.)

11:28:30 24 Q. (By Mr. Norris) Dr. Longo, could you
 11:28:33 25 please state and spell your name for the record.

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11:28:35 1 A. William Edward Longo, L-o-n-g-o.
 11:28:37 2 Q. Okay. And you've been deposed a few times
 11:28:41 3 before?

11:28:41 4 A. I have.

11:28:41 5 Q. Sufficient -- you feel comfortable
 11:28:44 6 dispensing with the admonitions?

11:28:46 7 A. I do feel comfortable with that.

11:28:48 8 Q. Okay. When were you first contacted in
 11:28:55 9 this case?

11:28:55 10 A. The only thing I can tell you is I got a
 11:29:01 11 June 7, 2018, letter from Simon Greenstone
 11:29:04 12 transmitting the three depositions that I have.

11:29:11 13 Q. Let's mark as Exhibit 4 the June 7, 2018,
 11:29:16 14 letter sending Dr. Longo the three transcripts of
 11:29:23 15 deposition. Just to confirm, that is the two volumes
 11:29:27 16 of Mr. Von Salzen's deposition and the one volume of
 11:29:31 17 Mrs. Von Salzen's deposition; correct?

11:29:34 18 A. That would be correct.

19 (Defendant's Exhibit 4 was marked for
 20 identification.)

21 Q. (By Mr. Norris) Okay. Aside from those
 22 three documents, have you reviewed any other
 23 materials specific to the Von Salzen matter,
 24 discovery responses, depositions, other case-specific
 25 materials?

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11:29:45 1 A. No, no, and no.
 11:29:49 2 Q. Okay. I am showing you a document which
 11:29:53 3 I've marked as Exhibit 3 which you personally handed
 11:29:57 4 to me. Is this document, which is marked as
 11:30:01 5 Exhibit 3, a true and accurate copy of the notes you
 11:30:06 6 prepared in this case?

11:30:06 7 A. Yes.

11:30:07 8 Q. All right. So aside from the first
 11:30:08 9 contact on June 7, 2018, have you had any subsequent
 11:30:13 10 contacts?

11:30:13 11 A. I'm sure I had contacts before that; I
 11:30:16 12 just don't recall it. And the only other contact I
 11:30:23 13 have had is with Mr. Purdy this morning.

11:30:26 14 Q. When did that occur?

11:30:28 15 A. He arrived at the office at about 9:15
 11:30:39 16 this morning.

11:30:40 17 Q. And how long did you meet at your office
 11:30:44 18 this morning?

11:30:44 19 A. Until we came over here.

11:30:47 20 Q. I personally saw Mr. Purdy here around
 11:30:53 21 11:00 o'clock, so safe to say that you met for about
 11:30:56 22 an hour and a half?

11:30:57 23 A. Correct.

11:30:57 24 Q. What did you discuss in that hour and a
 11:31:01 25 half?

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11:31:01 1 A. Probably only spent about 15, 20 minutes
 11:31:05 2 talking about this case. I was still trying to edit
 11:31:11 3 and finish the notes, and then we discussed other
 11:31:14 4 nonrelated issues as we chatted.

11:31:20 5 Q. How do you prepare these notes?

11:31:23 6 A. I read the depositions and I highlight
 11:31:26 7 them and then I go through and try to -- things that
 11:31:32 8 I may want to remember during the deposition, you
 11:31:34 9 know, where Mr. Von Salzen lived, where he went to
 11:31:41 10 school, where he worked, and then of course try to do
 11:31:45 11 a brief outline of his exposure to body powders.

11:31:49 12 Q. Do you personally transcribe or type the
 11:31:51 13 notes?

11:31:52 14 A. No.

11:31:52 15 Q. Okay. Who does that?

11:31:55 16 A. My assistant.

11:32:04 17 Q. How does that process work? How does she
 11:32:07 18 know what to type?

11:32:08 19 A. My handwritten notes.

11:32:14 20 Q. So as you're reading the deposition you
 11:32:16 21 take handwritten notes, provide them to your
 11:32:19 22 assistant, and she types it up?

11:32:20 23 A. Typically what I do is read all the
 11:32:22 24 depositions and highlight the volumes of some of
 11:32:27 25 these facts, and then I'll go back and review what

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12:55:31 1 specific on the methodology that you use, the
 12:55:33 2 step-by-step methodology, have any of those agencies
 12:55:36 3 approved or considered it?
 12:55:37 4 A. Well, they haven't considered, they
 12:55:42 5 haven't said you can't do it, and they're silent on
 12:55:45 6 it. The heavy liquid density separation method for
 12:55:49 7 removing amphiboles in talc has not been discussed or
 12:55:52 8 not been written up or not approved or disapproved by
 12:55:56 9 any of those organizations.

12:56:01 10 MR. CALFO: I think you better break it
 12:56:04 11 up.

12:56:04 12 MR. NORRIS: I know. I think so. And
 12:56:10 13 again --

12:56:10 14 MR. PURDY: Sure. When we get to a new
 12:56:14 15 topic, I'll start to raise that. I mean, these
 12:56:18 16 just have all been asked so many times not only
 12:56:21 17 by -- we don't even have the different firm
 12:56:24 18 argument that Johnson & Johnson has for the same
 12:56:26 19 firm, although maybe Alston & Bird asks
 12:56:29 20 questions a little differently. It's just very,
 12:56:31 21 very, very repetitive. It's unfortunate, but go
 12:56:35 22 ahead.

12:56:36 23 MR. NORRIS: All right. I'm going to move
 12:56:38 24 on from that.

12:56:40 25 Q. (By Mr. Norris) When Blount decided on
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12:59:48 1 tremolite, anthophyllite, actinolite, and she chose
 12:59:52 2 2.81.
 12:59:52 3 Q. Because her tests indicated that the best
 12:59:54 4 density for a heavy liquid to separate talc from
 12:59:57 5 amphibole was 2.81; correct?
 12:59:59 6 A. That's what she states.
 13:00:01 7 Q. Okay. How did you go about determining
 13:00:03 8 2.85 was the value you were going to use?
 13:00:06 9 A. Because 2.81 -- because 2.85 is much
 13:00:13 10 lower -- is still low enough than tremolite, and 2.85
 13:00:20 11 is heavier, so we were trying to make it more
 13:00:23 12 efficient to remove the talc because you're using a
 13:00:27 13 heavier liquid than the 2.81. That was our decision.
 13:00:31 14 Q. Did you perform tests at 2.82, 2.83, 2.84
 13:00:36 15 before selecting 2.85?
 13:00:38 16 A. No.
 13:00:45 17 Q. Blount in her paper mentions counting 20
 13:00:53 18 fields of view. Just for purposes of my -- I just
 13:00:58 19 want to make sure I understand and am interpreting
 13:01:00 20 her correctly or your understanding of it.
 13:01:02 21 When she says fields of view, is that the
 13:01:06 22 same thing as the grid openings that you're counting?
 13:01:08 23 A. Yes and no. A grid opening is not a field
 13:01:12 24 of view, depending on your magnification. She's
 13:01:14 25 using polarized light microscopy, and she's using one
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12:56:43 1 the 2.81 heavy density liquid, that was as a result
 12:56:50 2 of multiple tests of liquid densities ranging from
 12:56:55 3 below 2.1 to above 2.1; correct?

12:57:20 4 I'm going to give you another document
 12:57:22 5 while you're looking for that answer. I'd like to
 12:57:24 6 mark as Exhibit 10 a publication by Blount titled
 12:57:32 7 Detection and Quantification of Asbestos and Other
 12:57:35 8 Trace Minerals, dated 1990, and that will be
 12:57:41 9 Exhibit 10.

12:57:54 10 (Defendant's Exhibit 10 was marked for
 12:57:55 11 identification.)

12:57:55 12 Q. (By Mr. Norris) I'm looking at page 560
 12:58:41 13 of Exhibit 10.

12:58:50 14 A. She used one type. She just adjusted it.
 12:58:54 15 We do the same thing.

12:59:20 16 Q. You understand that she added extra weight
 12:59:25 17 drop-by-drop to determine the best weight to use for
 12:59:29 18 this method; correct?

12:59:30 19 A. That's not really what she's doing. She's
 12:59:32 20 adding drops of water. She's mixing it to adjust the
 12:59:36 21 density.

12:59:37 22 We do the same thing. We adjusted ours to
 12:59:40 23 2.5.

12:59:40 24 She's taking one type of heavy liquid
 12:59:43 25 density and she's basing it on the densities of
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13:01:20 1 magnification. So typically a magnification of --
 13:01:23 2 whatever the magnification she's using, she's saying
 13:01:26 3 this is what I can see. And then she's moving it.
 13:01:29 4 In a TEM grid, your field of view at 200X
 13:01:33 5 is most of the grid openings, or 50X. At 20,000 to
 13:01:39 6 25,000 your field of view is approximately 1/20 of a
 13:01:47 7 grid opening, and a grid opening is 100 microns by
 13:01:52 8 100 microns.
 13:01:53 9 So it's two completely different things,
 13:01:56 10 but we call it grid openings, and if you say I have a
 13:02:00 11 200 mesh or a 100 mesh grid, then we know the size.
 13:02:05 12 Q. Okay. All right. When you performed your
 13:02:09 13 calculations on how many fibers per gram were present
 13:02:13 14 in these samples, how did you go about performing
 13:02:18 15 that mathematical calculation?
 13:02:21 16 A. Well, we start with 20 milligrams. That's
 13:02:25 17 put into the heavy liquid density solution. After
 13:02:30 18 it's spun, we take the -- we harvest the amphiboles
 13:02:37 19 or the minerals that -- the amphibole minerals
 13:02:41 20 technically that have a higher density than 2.85. We
 13:02:45 21 filter it all onto a 20 millimeter square filter.
 13:02:53 22 From there we take the TEM samples.
 13:02:58 23 So say, for example, you find one fiber
 13:03:04 24 and you're starting with 20 milligrams on the filter
 13:03:08 25 and you look at 100 grid openings, so you take the
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13:03:11 1 average size of the grid openings, multiply it by 100
 13:03:16 2 and then divide that into the overall surface area of
 13:03:19 3 the filter and then calculate one fiber found on that
 13:03:23 4 100 grid openings and mathematically going back to
 13:03:27 5 what it would be for what's in the entire sample in
 13:03:31 6 the grid and then divide by 20.

13:03:33 7 Q. My question was not -- is there an
 13:03:37 8 equation somewhere that I can look at that was used?
 13:03:42 9 A. Any individual who is a TEM -- your expert
 13:03:45 10 should be able to do it. Any individual who runs
 13:03:49 11 TEMs or knows TEMs will know how to do this.

13:03:53 12 Q. Okay.

13:03:53 13 A. So if you think about it, you start with
 13:03:56 14 20 milligrams of material.

13:03:57 15 Q. Understood.

13:03:58 16 A. That's your starting weight. We're using
 13:04:01 17 everything from that 20 milligrams of material, the
 13:04:04 18 heavy density liquid separates 99.9 percent of the
 13:04:09 19 talc, but you're putting everything that you
 13:04:11 20 harvested from the bottom of the heavy liquid density
 13:04:21 21 on a 20 millimeter diameter filter.

13:04:24 22 You calculate the surface area of that,
 13:04:26 23 and then you calculate how many fibers, if any, you
 13:04:30 24 found on the 100 grid openings, if you count 100 grid
 13:04:34 25 openings, then you take the ratio of the two, then

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13:04:37 1 you can calculate back to the 20 milligrams, and then
 13:04:40 2 the 20 milligrams, if you have that much in
 13:04:43 3 20 milligrams, then how much is in 1 gram.
 13:04:46 4 Q. Let me make it very simple. Safe to say
 13:04:50 5 that you did not use the calculation that Blount
 13:04:52 6 used?

13:04:53 7 A. That's safe to say because it's unclear
 13:04:56 8 how Blount did her calculation. We've looked at it,
 13:05:03 9 and I would need to talk to Blount. It doesn't
 13:05:06 10 provide the information I believe necessary to do
 13:05:08 11 that.

13:05:09 12 And it's PLM. It's not TEM. You can't
 13:05:12 13 take how do you calculate how much apple is there if
 13:05:16 14 you're using an orange type thing. It's totally two
 13:05:19 15 different calculations.

13:05:21 16 Q. Well, let me ask you this. In your
 13:05:26 17 calculation do you have to determine the efficiency
 13:05:29 18 ratio of your ability to separate the amphiboles from
 13:05:34 19 the talc?

13:05:35 20 A. No.

13:05:35 21 Q. Why not?

13:05:36 22 A. That has nothing to do with the
 13:05:39 23 calculation. We're only -- we're calculating what we
 13:05:43 24 have found, not what potentially is there. That's an
 13:05:47 25 unknown.

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13:05:51 1 Q. Well, do you agree that Blount's

13:05:54 2 calculation addressed an efficiency ratio?

13:05:58 3 A. She did.

13:06:00 4 Q. Okay. So another thing that is different

13:06:03 5 from Blount's method is you have not used her

13:06:07 6 calculation for determining fibers per gram; is that

13:06:11 7 correct?

13:06:11 8 A. We have not used her PLM calculation. It

13:06:14 9 has no bearing on TEM. At some point, if we could do

13:06:18 10 the research and go all the way down where we say we

13:06:21 11 find 15 million per gram and may in fact be 30

13:06:28 12 million per gram, if you start looking at the

13:06:30 13 efficiency of it.

13:06:30 14 But I just don't think that is applicable

13:06:34 15 here because she's doing this an on optical

13:06:37 16 microscopy level; we're doing it on a TEM level. I

13:06:42 17 just don't believe that's valid, what she's doing,

13:06:47 18 how repeatable that is over and over and over and you

13:06:50 19 really know what you're starting with on how many

13:06:52 20 fibers per milligram you have.

13:07:00 21 Q. Also, Blount recommended that you use an

13:07:06 22 index of refraction of 1.584. Is that purely for PLM

13:07:12 23 purposes?

13:07:13 24 A. Yes.

13:07:16 25 Q. Okay.

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13:07:16 1 A. There's no light in the transmission
 13:07:18 2 electron microscope. It's all electrons.

13:07:24 3 Q. Okay. What about your method is identical
 13:07:29 4 to her method?

13:07:31 5 A. Identical? Since we changed the method,
 13:07:45 6 there's not much identical to it because we're using
 13:07:50 7 two different counting methods.

13:07:51 8 Her name gets on here as the Blount method

13:07:55 9 because at least she's the first person to publish

13:07:58 10 using heavy density liquid material and analyzing

13:08:04 11 cosmetic talc. I mean, others have done this. Even

13:08:09 12 R. J. Lee, when they issued a report -- a TEM report,

13:08:14 13 called it the Blount method. They didn't do an

13:08:18 14 identical method, and they called it the Blount

13:08:21 15 method.

13:08:22 16 You know, and Pooley proposed it; he just
 13:08:26 17 called it a heavy density liquid method. When the

13:08:31 18 Colorado School of Mines proposed using this for

13:08:34 19 cosmetic talc, they just called it the heavy liquid

13:08:36 20 density method. Maybe that would have been better

13:08:38 21 and we could eliminate at least 15 minutes of

13:08:41 22 cross-examination at trial.

13:08:48 23 Q. After performing the heavy density

13:09:15 24 separation method that you used, what percentage of

13:09:18 25 the material remaining after separation is an

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1 CERTIFICATE

2
 3 STATE OF GEORGIA:
 4 COUNTY OF GWINNETT:

5
 6 I hereby certify that the foregoing
 7 transcript was taken down, as stated in the
 8 caption, and the questions and answers thereto
 9 were reduced to typewriting under my direction;
 10 that the foregoing pages 1 through 184 represent
 11 a true, complete, and correct transcript of the
 12 evidence given upon said hearing, and I further
 13 certify that I am not of kin or counsel to the
 14 parties in the case; am not in the regular
 15 employ of counsel for any of said parties; nor
 16 am I in anywise interested in the result of said
 17 case.

18 This, the 6th day of July 2018.

20 _____
 21 DEBRA R. LUTHER, B-881
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2 Pursuant to Article 10.B. of the Rules and
 3 Regulations of the Board of Court Reporting of the
 4 Judicial Council of Georgia which states: "Each court
 5 reporter shall tender a disclosure form at the time
 6 of the taking of the deposition stating the
 7 arrangements made for the reporting services of the
 8 certified court reporter, by the certified court
 9 reporter, the court reporter's employer, or the
 10 referral source for the deposition, with any party to
 11 the litigation, counsel to the parties or other
 12 entity. Such form shall be attached to the
 13 deposition transcript," I make the following
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19 I do hereby certify that I have read all
 20 questions propounded to me and all answers given by
 21 me on the 27th day of June 2018, taken before
 22 Debra R. Luther, and that:

23 1) There are no changes noted.
 24 2) The following changes are noted:

25 Pursuant to Rule 30(e) of the Federal Rules of
 Civil Procedure and/or the Official Code of Georgia
 Annotated 9-11-30(e), both of which read in part:
 Any changes in form or substance which you desire to
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14 If supplemental or additional pages are necessary,
 15 please furnish same in typewriting annexed to this
 16 deposition.

17

18

19 WILLIAM E. LONGO, PhD

20 Sworn to and subscribed before me,

21 This, the ____ day of ____ 20____.

22 Notary Public
 23 My commission expires: _____

24

25